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MAY 20 2025

CLERK U S DISTRICT COURT
DISTRICT OF ARIZONA
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District of Arizona

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REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

No.

CR-25-00776-PHX-DJH (JZB)

Plaintiff,

INDICTMENT

vs.

VIO: 18 U.S.C. §§ 922(o) and 924(a)(2)
(Possession or Transfer of a
Machinegun)
Count 1

Jakob Vandorn,

Defendant.

Count 1
18 U.S.C. §§ 922(a)(1)(A), 923(a),
and 924(a)(1)(D)
(Dealing Firearms without a License)
Count 2

21 THE GRAND JURY CHARGES:

COUNT 1

On or between August 29, 2024, and April 16, 2025, in the District of Arizona, Defendant, JAKOB VANDORN, did knowingly possess and transfer a machinegun, that is, machinegun conversion devices, parts commonly known as “Glock switches” and “auto sears,” which are designed and intended solely and exclusively for use in converting a firearm into a machinegun.

28 In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

1

COUNT 2

2 On or between April 22, 2022, and April 16, 2025, in the District of Arizona,
3 Defendant, JAKOB VANDORN, not being a licensed dealer of firearms within the
4 meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business
5 of dealing in firearms.

6 In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and
7 924(a)(1)(D).

8

FORFEITURE ALLEGATIONS

9 The Grand Jury realleges and incorporates the allegations in Counts 1 and 2 of this
10 Indictment, which are incorporated by reference as though fully set forth herein.

11 Pursuant to Title 18, United States Code, Sections 924(d) and 981, Title 21 United
12 States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and
13 upon conviction of the offenses alleged in Counts 1 and 2 of this Indictment, the defendant
14 shall forfeit to the United States of America all right, title, and interest in (a) any property
15 constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as
16 the result of the offense, and (b) any of the defendant's property used, or intended to be
17 used, in any manner or part, to commit, or to facilitate the commission of, such offense as
18 to which property the defendants is liable. If any forfeitable property, as a result of any act
19 or omission of the defendant:

20 (1) cannot be located upon the exercise of due diligence,
21 (2) has been transferred or sold to, or deposited with, a third party,
22 (3) has been placed beyond the jurisdiction of the court,
23 (4) has been substantially diminished in value, or
24 (5) has been commingled with other property which cannot be divided
25 without difficulty,
26 it is the intent of the United States to seek forfeiture of any other property of said defendant
27 up to the value of the above-described forfeitable property, pursuant to Title 21, United
28 States Code, Section 853(p).

1 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title
2 21 United States Code, Sections 853 and 881, and Title 28, United States Code, Section
3 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

A TRUE BILL

s/
FOREPERSON OF THE GRAND JURY
Date: May 20, 2025

TIMOTHY COURCHAINE
United States Attorney
District of Arizona

s/
PATRICK E. CHAPMAN
Assistant U.S. Attorney